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Robinson & Yablon, P.C.

ATTORNEYS AT LAW

232 MADISON AVENUE, SUITE 1200 NEW YORK, NEW YORK 10016

> TELEPHONE: (212) 725-8566 FACSIMILE: (212) 725-8567

JOEL H. ROBINSON LAWRENCE T. YABLON

ANDREW M. LASKIN

SO ORDERED

ELECTRONICALLY FILED

July 31, 2007

HON. GEORGE B. DANIELS

AUG 0 9 2007

Re:

Burke v. Rodriguez 07 Civ. 3732 (GBD)

Dear Judge Daniels:

500 Pearl Street

Via ECF and First Class Mail
Hon. George B. Daniels
United States District Court

Southern District of New York

New York, New York 10007

I am the attorney for plaintiff in the referenced matter. I have conferred with defense counsel regarding the matters raised herein and have consent for my application. I am presently engaged on trial before Justice Knipel in Supreme Court, Kings County. I have a jury selected and will begin my case in chief today. I expect the trial will last approximately one week. Our initial case management conference is scheduled for August 7, 2007, and I request the conference be adjourned for 45 days. No prior application for an adjournment has been made.

A further basis exists for the requested adjournment. Defendant has filed a Rule 12(b) motion, and plaintiff's opposition papers, as per stipulation between the parties, are due on August 6, 2007. Defense counsel has agreed to an additional ten days time for plaintiff to file her opposition papers and, naturally, we agree to provide defendant a corresponding extension of time to serve his reply. Based upon the foregoing, the parties agree to have a fully briefed motion before your Honor before we proceed with the initial case management conference. Perhaps it might serve judicial economy to utilize one date for oral argument and the initial conference.

Finally, despite extensive efforts on my part, I have been unable to change the notification email address on the docket from that of my prior firm. So as to ensure that I receive all future notification, I ask that your Honor's Courtroom Deputy please change my email address on the docket to <a href="mailto:alaskin@robyablaw.com">alaskin@robyablaw.com</a>.

Very truly yours,

BINSON & YABLON, P.C.

Andrew M. Laskin (AL9379)

Kudman Trachten Aloe, LLP 350 Fifth Avenue, Suite 4400 New York, New York 10118 Attn: Alisa L. Silverstein, Esq